

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	BK. NO. 15-05085 RNO
Frank J. Cherichella Jr. aka Frank Joseph	:	Chapter 13
Cherichella, Jr. aka Frank Cherichella, Jr. aka Frank	:	
Cherichella, aka Frank J. Cherichella, aka Frank Joseph	:	
Cherichella	:	
Joann Colucci-Cherichella aka Joann C.	:	
Cherichella, aka Joann P. Colucci-Cherichella, aka	:	
Joanna Patricia Colucci-Cherichella	:	
Debtors	:	

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Nationstar Mortgage, LLC, dba Mr. Cooper	:	
Movant	:	Motion for
v.	:	Relief from Stay
Frank J. Cherichella Jr. aka Frank Joseph Cherichella, Jr.	:	
aka Frank Cherichella, Jr. aka Frank Cherichella, aka	:	
Frank J. Cherichella, aka Frank Joseph Cherichella	:	
Joann Colucci-Cherichella aka Joann C. Cherichella, aka	:	
Joann P. Colucci-Cherichella, aka Joanna Patricia	:	
Colucci-Cherichella	:	
Debtors,	:	
and	:	
Charles J. DeHart, III Esq.	:	
Trustee	:	

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ANSWER TO MOTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
FOR RELIEF FROM STAY

AND NOW COMES Debtors, Frank J. Cherichella Jr. and Joann Colucci-Cherichella, by and through their attorneys, Newman, Williams, Mishkin, Corveleyn, Wolfe & Fareri, P.C., and in Answer to the Motion of Nationstar Mortgage, LLC, dba Mr. Cooper, for Relief from Stay aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

5. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

6. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

7. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

8. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

9. Denied. This paragraph represents a legal conclusion to which no response is necessary.

To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

WHEREFORE, Debtors, Frank J. Cherichella Jr. and Joann Colucci-Cherichella, respectfully prays this Honorable Court for an Order that the Motion of Nationstar Mortgage, LLC, dba Mr. Cooper, for Relief from Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

**NEWMAN WILLIAMS, P.C.**

By: /s/ Robert J. Kidwell  
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